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5 Attorney for Defendant
6 GABRIEL ZENDEJAS-CHAVEZ

7 UNITED STATES DISTRICT COURT

8 FOR THE CENTRAL DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,

No. CR 18-173-GW

10 Plaintiff,

DEFENDANT CHAVEZ'S STATEMENT OF
THE CASE

11 v.

12 GABRIEL ZENDEJAS-CHAVEZ (3),

Location: Courtroom of the
Hon. George Wu

13 Defendant.

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15 Defendant Gabriel Zendejas-Chavez, by and through his counsel of
16 record, Meghan Blanco, files the instant proposed statement of the
17 case.

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19 Dated: July 23, 2022

Respectfully submitted,

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21 /s/
22 MEGHAN BLANCO
23 Attorney for Defendant
24 GABRIEL ZENDEJAS-CHAVEZ

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STATEMENT OF THE CASE -- DEFENSE

The First Superseding Indictment ("Indictment") charges Gabriel
Zendejas-Chavez with violations of federal criminal law. The
Indictment is not evidence. Mr. Zendejas-Chavez has entered a plea
of not guilty and is presumed innocent of the charges against him.
The Indictment alleges that Mr. Zendejas-Chavez conspired with others
to conduct or to participate in the affairs of the Mexican Mafia's
Los Angeles County Jail System ("LACJ") Enterprise through a pattern
of racketeering activity, including acts involving extortion and drug
trafficking.

11 Mr. Zendejas-Chavez is a defense attorney. The Indictment
12 alleges that Mr. Zendejas-Chavez acted as a facilitator, that is, a
13 highest-level associate, for two Mexican Mafia members who controlled
14 the Mexican Mafia LACJ Enterprise and would act with the authority of
15 those members in directing the criminal activities of the Mexican
16 Mafia LACJ Enterprise, including extortion and drug sales. In
17 particular, the Indictment alleges that Mr. Zendejas-Chavez would use
18 his position as an attorney to assist Mexican Mafia Member Jose
19 Landa-Rodriguez, another now-deceased Mexican Mafia member, and other
20 members of the LACJ Enterprise, with criminal activities.

21 Mr. Zendejas-Chavez is charged in four counts of the Indictment.
22 Count One charges Mr. Zendejas-Chavez with conspiring to violate the
23 federal Racketeer Influenced and Corrupt Organizations Act, also
24 known as "RICO."

25 Count Five charges Mr. Zendejas-Chavez with conspiring to
26 distribute methamphetamine, heroin, cocaine, and marijuana. Count
27 Five further alleges that the overall conspiracy, to which Mr.
28 Zendejas-Chavez is alleged to have been a member, involved the

1 following:

- 2 (1) at least 500 grams of a mixture and substance containing a
3 detectable amount of methamphetamine;
4 (2) at least 50 grams of methamphetamine;
5 (3) at least 100 grams of a mixture and substance containing a
6 detectable amount of heroin;
7 (4) cocaine; and
8 (5) marijuana

9 Count Seven charges Mr. Zendejas-Chavez with aiding and abetting
10 the possession with intent to distribute of approximately 7.75 grams
11 of methamphetamine.

12 Count Eight charges Mr. Zendejas-Chavez with aiding and abetting
13 the possession with intent to distribute of approximately 2.37 grams
14 of a mixture and substance containing a detectable amount of heroin.

15 Once again, the Indictment is not evidence. Mr. Zendejas-Chavez
16 has entered a plea of not guilty and is presumed innocent of the
17 charges against him.